

**Remarks/Arguments**

Claims 1-5 are pending in the application. Claims 1-5 are rejected. New claim 6 is added.

**Claim Rejections Under 35 U.S.C. § 102**

Claims 1-5 stand rejected under 35 U.S.C. 102(b) as anticipated by Beeteson et al (US Pat. 5,877,745).

Beeteson is directed to a display device that also acts as a data pass-through system. In Beeteson, the display device 20 of Beeteson is used as an intermediary for passing data between system unit (e.g., a PC) 10 and peripherals 30, 40, 50. By using a wireless connection between the peripherals and the display device, the clutter of cables normally associated with the system unit is avoided. Beeteson does not contemplate that there is a mode in the display device where the functionality of the peripherals is manifested in the display device. That is, the Beeteson display device does not standalone to work with a peripheral – user interaction with the functionality, specific to each peripheral occurs only through the system unit. The foregoing distinction and other distinctions are reflected in the claims.

Claim 1, as original drafted, expressly recites "circuitry for enabling data communication with the first peripheral device for user control of a functionality of the display monitor". Further, claim 1 has been amended to emphasize this distinction, and now recites that the stand-alone mode enables "user interaction with functionality in the monitor through a first peripheral device to the monitor, the user interaction being determined by a functionality specific to the peripheral device." (Support for the amendment is found in paragraph 008, for example.)

The specification provides examples of user controllable functionality: mouse, keyboard, CD-ROM, CD-R/W, and card reader. (Paragraph 008.) Beeteson does not include any teaching that (1) users have any control over functionality in the display device 20 through

Page 4 - RESPONSE TO OFFICE ACTION DATED OCTOBER 22, 2003  
Serial No. 09/919,661

the peripheral devices, and/or (2) that a specific functionality for a peripheral device enables control over any functionality in display device 20. In view of the original claim language, and in view of the claim as amended, claim 1 clearly distinguishes over Beeteson. Accordingly, entry and allowance of claim 1 is respectfully requested. However, if the Examiner does not allow amended claim 1, the rejection of original claim 1 is traversed based on at least the original language concerning user control, and allowance is requested.

As a further point of distinction, as reflected in claim 2 and new claim 6, Beeteson does not disclose that display device 20 has any intelligence to sense the connection state of system unit 20. The present invention provides a stand-alone mode having (1) user controllable functionality, if the system unit is disconnected from the display device, and (2) a further operational mode for enabling peripheral functionality through the data processing system, if the system is disconnected. The present invention does have such intelligence, as reflected in claim 1's language: "when the monitor is in the further operational mode and connected to the system and the first peripheral". This language qualifies when data from the peripherals may be passed through the display monitor to the data processing system, in the further operational mode. To further emphasize and define this distinction, claim 6 has been added to recite "wherein the monitor includes mode switching circuitry for detecting the monitor's connection state with a data processing system and determines whether the monitor should be in the stand-alone mode or the further operational mode depending on the connection state." Support for this amendment is found, for example, in paragraph 007 of the specification. Claim 2 has been amended to further define the mode switching circuitry. Support for the amendment and the new claim is found in paragraph 007. In any case, if the amendment is not entered, the rejection of claims 1 and 2 is traversed in view of the original language of claims 1 and 2 concerning the connection state and/or in view of the remarks above concerning base claim 1.

Claims 3-5 depend directly or indirectly from claim 1 or 2 and are therefore allowable for at least the same reasons that claims 1 and 2 are allowable.

Additionally, regarding claims 2-3, Beeteson does not disclose detecting changes in monitor mode, as claimed. It is unclear from the Office Action what the Examiner considers to be *"wherein the further circuitry is operative to automatically set the monitor in the further operation mode when detecting the monitor being connected to the data processing system"*, as the Action does not correspond this language to specific features in Beeteson. Clarification is respectfully requested, otherwise the rejection is traversed for at least the reason that all limitations of the claims are not found in the prior art.

Additionally, regarding claim 4, the Examiner states *"Beeteson disclosed the second input from PC in Fig. 1-2"*. However, it is unclear how this corresponds to the full language of the claim: *"a further input for connection to a data storage device and for receipt of data to be rendered on the monitor in the stand-alone mode under user control of the first peripheral"*. Clarification is respectfully requested, otherwise the rejection is traversed for at least the reason that all limitations of the claim are not found in the prior art.

Additionally, regarding claim 5, the conversion to which the Examiner refers occurs before the transfer of data to the display device – the data is converted by a connected peripheral. However, claim 5 recites that *the monitor* includes the circuitry for the data conversion. The claim also recites a specific operational mode for the conversion. Accordingly, the rejection of claim 5 is traversed for at least these reasons.

One clarification of Beeteson is needed at this time that should help the Examiner better appreciate the patentability of the claims. The Examiner, citing col. 5, lines 5-30, states that *"Beeteson discloses the circuitry 25 for enabling data communication with the peripheral device for user control for different modes"*. Applicant respectfully notes that the cited passage does not refer or relate to users or user controllable features. The cited passage relates to the

mapping of peripheral devices to the system unit so that the data from the peripheral devices passes through to the system unit. Nowhere does Beeteson teach that users can interact with the display device 20 through a peripheral.

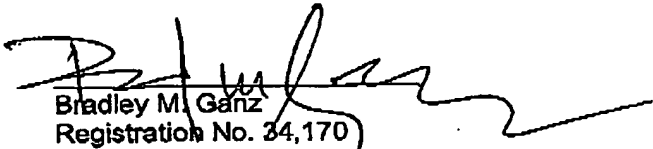
(In view of the foregoing reasons for distinguishing over the cited references, Applicant has not raised other possible grounds for traversing the rejections, and therefore nothing herein should be deemed as acquiescence in any rejection or waiver of arguments not expressed herein.)

#### **CONCLUSION**

Applicant submits that in view of the foregoing arguments and/or amendments, the application is in condition for allowance, and favorable action is respectfully requested. The Commissioner is hereby authorized to charge any fees, including extension fees, which may be required, or credit any overpayments, to Deposit Account No. 50-1001.

Respectfully submitted,

Date: December 3, 2003



Bradley M. Ganz  
Registration No. 34,170  
P. O. Box 10105  
Portland, Oregon 97298  
Telephone: (503) 224-2713  
Facsimile: (503) 296-2172  
email: [brad@ganzlaw.com](mailto:brad@ganzlaw.com)

#### **Correspondence to:**

Philips Intellectual Property & Standards  
1109 McKay Drive; Mail Stop SJ41  
San Jose, CA 95131 USA  
Telephone: (408) 617-7700  
Facsimile: (408) 617-4856  
USPTO Customer Number: 24738

Page 7 - RESPONSE TO OFFICE ACTION DATED OCTOBER 22, 2003  
Serial No. 09/919,661